

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	)	
<b>RYAN MICHAEL FRANCIS</b>	)	<b>Case No. 23-22322-GLT</b>
<b>JENNIFER MARIE FRANCIS,</b>	)	
<b>Debtors,</b>	)	<b>Chapter 13</b>
	)	
	)	<b>Doc No. _____</b>
	)	
<b>RYAN MICHAEL FRANCIS</b>	)	<b>Related to Doc. No.</b>
<b>JENNIFER MARIE FRANCIS,</b>	)	
<b>Movants,</b>	)	<b>Related to: Notice of Mortgage</b>
	)	<b>Payment Change Filed 1/8/2025</b>
	)	
<b>-vs-</b>	)	
	)	
<b>NATIONSTAR MORTGAGE, LLC,</b>	)	
<b>CAPITAL ONE AUTO, and</b>	)	
<b>RONDA J. WINNECOUR, TRUSTEE,</b>	)	
<b>Respondents.</b>		

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE**  
**FILED ON JANUARY 8, 2025**

AND NOW, come the Debtors, Ryan Michael Francis and Jennifer Marie Francis, by and through counsel, Richard W. Schimizzi, Esquire, and Schimizzi Law, LLC, and files the following Declaration Regarding the Notice of Mortgage Payment Change Filed January 8, 2025:

1. By Notice of Mortgage Payment Change filed January 8, 2025, Debtors' current mortgage payment will increase to \$1,665.55, effective February 1, 2025.
2. Debtors have been instructed to increase their monthly plan payment from \$2,292.00 to \$2,346.00 to accommodate this mortgage payment increase.
3. As a result of the Debtors increasing their plan payment, the plan will be sufficient to pay the new mortgage amount.

WHEREFORE, Debtors respectfully request that the Chapter 13 Trustee implement the new mortgage payment to Nationstar Mortgage, LLC in the amount of \$1,665.55 per month effective February 1, 2025..

Respectfully submitted:  
SCHIMIZZI LAW, LLC

Date: January 24, 2025

BY: /s/ Richard W. Schimizzi  
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